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6

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA
9 SAN JOSE DIVISION
10

11 UNITED STATES OF AMERICA,)	No. CR 11-00749 - LHK
)	
12 Plaintiff,)	
)	
13 v.)	AMENDED STIPULATION TO
)	CONTINUE STATUS HEARING TO
14 LUIS RUIZ-LOPEZ,)	MAY 30, 2012; PROPOSED ORDER
)	
15 Defendant.)	<u>HONORABLE LUCY H. KOH</u>
_____)	
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17		

18 **STIPULATION**

19 Defendant and the government, through their respective counsel, subject to the court's
20 approval, hereby stipulate that the Court continue the status hearing in the above-captioned
21 matter, presently scheduled for, May 2, 2012 at 9:00 a.m., to May 30, 2012, at 9:00 a.m. The
22 reason for the stipulation is as follows. Defense counsel was recently reassigned this case from
23 Assistant Federal Public Defender Heather Rogers who resigned from the office effective April
24 13, 2012. The undersigned defense counsel for Mr. Ruiz-Lopez needs additional time to review
25 the file, confer with his client, and complete any investigation suggested by his discussions with
26 his client. Counsel also needs time to discuss with the assistance an interpreter the plea offer

Stipulation to Continue Status Hearing;
~~Proposed~~ Order
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extended by the government. In addition, defense counsel is a member of the Federal Public Defender's Office hiring committee which will be conducting all-day interviews on May 2, 2012. The parties further agree and stipulate that time should be excluded from and including May 2, 2012, through and including May 30, 2012, to provide counsel reasonable time to prepare, pursuant to Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A) and (B)(iv). Accordingly, the United States and the defendant agree that granting the requested exclusion of time will serve the interest of justice and outweigh the interest of the public and defendant in a speedy trial.

Dated: April 25, 2012

_____/s/_____
MANUEL ARAUJO
Assistant Federal Public Defender

Dated: April 25, 2012

_____/s/_____
CAROLYNE A. SANIN
Special Assistant United States Attorney

~~PROPOSED~~ ORDER

Good cause appearing and by stipulation of the parties, it is hereby ordered that the status conference hearing in the above-captioned matter is continued from May 2, 2012, at 9:00 a.m., to May 30, 2012, at 9:00 a.m. It is further ordered that the period of delay from May 2, 2012, through and including May 30, 2012, be excluded for purposes of Speedy Trial Act computations pursuant to Title 18, United States Code, Sections 3161(h)(7)(A) and 3161(h)(7)(B)(iv).

Dated: 4/26/12


HONORABLE LUCY H. KOH
United States District Judge